JUL 12 2004

No. 03-633

IN THE

Supreme Court of the United States

DONALD P. ROPER,
SUPERINTENDENT, POTOSI CORRECTIONAL CENTER,

Petitioner,

v.

CHRISTOPHER SIMMONS,

Respondent.

ON WRIT OF CERTIORARI TO
THE SUPREME COURT OF MISSOURI

BRIEF OF *AMICI CURIAE* MURDER VICTIMS' FAMILIES FOR RECONCILIATION IN SUPPORT OF RESPONDENT

EMILY SACK
Associate Professor of Law
ROGER WILLIAMS UNIVERSITY
SCHOOL OF LAW
10 Metacom Avenue
Bristol, RI 02809

KATE LOWENSTEIN
Counsel of Record
MURDER VICTIMS' FAMILIES
FOR RECONCILIATION
2161 Massachusetts Avenue
Cambridge, MA 02140
(617) 868-0007

Counsel for Amici Curiae

Dated: July 12, 2004

BATEMAN & SLADE, INC. BOSTON, MASSACHUSETTS

TABLE OF CONTENTS

TABLE OF AUTHORITIES ii

STATEMENT OF *AMICUS CURIAE* INTEREST 1

SUMMARY OF ARGUMENT 2

ARGUMENT 3

I. THE EXECUTION OF JUVENILES SHOULD NOT BE JUSTIFIED IN THE NAME OF VINDICATING VICTIMS' RIGHTS. 3

II. FOCUSING ON THE DEATH PENALTY FOR JUVENILES AS A SOURCE OF EMOTIONAL CLOSURE DOES NOT SERVE THE NEEDS OF ALL VICTIMS. 5

III. BECAUSE OF THEIR YOUTH AND UNDERDEVELOPMENT JUVENILE OFFENDERS HAVE PARTICULAR POTENTIAL TO COME TO UNDERSTAND THE IMPACT OF THEIR CRIME, WHICH CAN PROVIDE SUPPORT TO MANY VICTIMS. 9

IV. MEMBERS OF MVFR SUPPORT HUMAN RIGHTS AND OPPOSE THE EXECUTION OF JUVENILES AS A VIOLATION OF INTERNATIONAL HUMAN RIGHTS LAW. 12

CONCLUSION 13

TABLE OF AUTHORITIES

FEDERAL CASES:

Thompson v. Oklahoma, 487 U.S. 815 (1988) 5, 9n

Woodson v. North Carolina, 428 U.S. 280 (1976) 9n

LAW REVIEW ARTICLES:

Andrew J. Karmen, *Who's Against Victims' Rights? The Nature of the Opposition to Pro-Victim Initiatives in Criminal Justice*, 8 St. John's J. Legal Comment. 157 (1992) 4n

Lawrence C. Marshall, *The Innocence Revolution and the Death Penalty*, 1 Ohio St. J. Crim. L. 573 (2004) 7n

Lynne Henderson, *Co-Opting Compassion: The Federal Victim's Rights Amendment*, 10 St. Thomas L. Rev. 579 (1998) 4n, 7n

Lynne Henderson, *Revisiting Victim's Rights*, 1999 Utah L. Rev. 383 (1999) 6n

Lynne N. Henderson, *The Wrongs of Victim's Rights*, 37 Stanford L. Rev. 937 (1985) 5n

Robert Mosteller, *Victims' Rights and the Constitution: Moving from Guaranteeing Participatory Rights to Benefiting the Prosecution*, 29 St. Mary's L. J. 1053 (1998) 4n

Susan Bandes, *Empathy, Narrative, and Victim Impact Statements*, 63 U. Chi. L. Rev. 361 (1996) 3n

Susan Bandes, *Victim Standing*, 1999 Utah L. Rev. 331 (1999) 4n

Susan Bandes, *When Victims Seek Closure: Forgiveness, Vengeance and the Role of Government*, 27 Fordham Urb. L. J. 1599 (2000) 3n

Victor Streib, *Juvenile Justice or Injustice? The Debate Over Reform*, 14 St. John's J. L. Comm. 371 (2000) 7n

Vik Kanwar, *Capital Punishment as "Closure": The Limits of a Victim-Centered Jurisprudence*, 27 N.Y.U. Rev. L. and Soc. Change 215 (2001-2002) 6n

Vivian Berger, *Payne and Suffering: A Personal Reflection and a Victim-Centered Critique*, 20 Fla. St. U. L. Rev. 21 (1992) 5n

BRIEFS ON RECORD:

Amici Curiae brief submitted in support of Petitioner 3n, 4n, 5n, 7n, 12

OTHER AUTHORITIES:

Murder Victims' Families for Reconciliation, *The Voice*, Spring/Summer 2003 ..... 8n

STATEMENT OF *AMICUS CURIAE* INTEREST

Murder Victims' Families for Reconciliation ("MVFR") is a victim-founded, victim-led national organization of family members of murder victims who oppose the death penalty. MVFR supports programs that address the needs of victims of violence, enabling them to heal and rebuild their lives. MVFR also advocates for programs and policies that reduce the rate of homicide and promote crime prevention and alternatives to violence. MVFR includes people of a wide variety of faiths and belief systems, and its members are geographically, racially, and economically diverse. MVFR works to ensure that our members, notwithstanding their opposition to the death penalty, are treated with equal fairness, dignity, and respect under the victims' rights laws and constitutions of the states.

MVFR seeks to provide the court with the broader perspective of victims' views on the juvenile death penalty. Our perspective is of murder victims' survivors who believe that the execution of 16- and 17-year-old juveniles will not vindicate victims' rights or heal their grief, but only create more pain and loss. MVFR members believe that their loved ones' lives will not be honored by the violation of these juveniles' human rights, but by the prevention of more killing.[1]

---

[1] Murder Victims' Families for Reconciliation files this brief with the consent of counsel for both parties. Pursuant to Supreme Court Rule 37.3, copies of letters of consent to the filing of this brief have been lodged with this Court. Counsel for Murder Victims' Families for Reconciliation authored this brief in its entirety. No counsel for any party authored this brief in whole or in part, and no person or entity, other than Murder Victims' Families for Reconciliation and its members, made monetary contribution to the preparation or submission of this brief.

SUMMARY OF ARGUMENT

Family members of murder victims come from a wide range of backgrounds and hold many different beliefs. Many strongly reject the death penalty despite the unrelenting pain caused by the murderer. For those whose family members were killed by juveniles, the youth of the offender raises the strongest doubts in them about the use of the punishment of death. Awareness of a 16- or 17-year-old's underdevelopment, hope that they might come to understand and take responsibility for their crime, and concern for the families of these youths who kill all come together to form a powerful opposition to the death penalty for juvenile offenders.

Members of Murder Victims' Families for Reconciliation reject the idea of using victims' rights to justify the death penalty for juveniles. Victims' rights must serve all victims, and many victims strongly oppose the death penalty. Furthermore, victims maintain their values and beliefs despite the trauma of a family member's murder. For many, these beliefs include the support for international human rights standards and a powerful sense that justice is not served by executing those who committed their crimes at 16 and 17 years old.

ARGUMENT

I. THE EXECUTION OF JUVENILES SHOULD NOT BE JUSTIFIED IN THE NAME OF VINDICATING VICTIMS' RIGHTS.

There is a prevailing assumption in our society that surviving family members of homicide victims want and need the death penalty in order to feel that justice has been served. In fact victims[2] come to this devastating experience with diverse beliefs, life backgrounds, and needs, and their response to the horror of having a family member murdered is as varied and diverse as the victims themselves. As Susan Bandes has written, "the suffering of crime victims may take many different forms, and it is difficult and dangerous to generalize about what victims experience, what victims want, or what is best for victims."[3]

In its amicus brief in support of the state in this case, the Justice for All Alliance ("JFAA") describes itself as an organization whose purpose is "to support victims of homicide and violent crimes," and "to act as an advocate for change in the criminal justice system to ensure that the rights of the victims and law-abiding citizens are protected."[4] JFAA perpetuates the myth that all victims support the death penalty, and that the state

---

[2] Because many state laws and constitutions define family members of homicide victims as "victims," we use the term "victim" to apply to both the homicide victim as well as surviving family members.

[3] Susan Bandes, *Empathy, Narrative, and Victim Impact Statements*, 63 U. Chi. L. Rev. 361, 405 (1996); *see also* Susan Bandes, *When Victims Seek Closure: Forgiveness, Vengeance and the Role of Government*, 27 Fordham Urb. L. J. 1599, 1601 (2000) ("[M]ost of us cannot know how we would react. Therefore, it seems to me we ought to be very slow to judge what any particular individual in that position ought to feel or want.").

[4] Brief of *Amici Curiae* Justice for All Alliance In Support of Petitioner, at 1 (hereinafter "JFAA Brief").

is supporting their rights by executing juveniles: "JFAA has an interest in ensuring that the efforts of the State of Texas to vindicate those [victims'] rights through the administration of its criminal laws are not unduly hampered."[5]

By invoking victims' rights in support of the death penalty, JFAA promotes the inaccurate assumption that all victims believe that the execution of offenders is justice for the crime.[6] Yet many victims who have experienced the loss of a family member to murder have strong beliefs that the death penalty is not the answer to their loss, and in fact can create more pain in their lives.[7] MVFR members have had to confront the issue of the death penalty directly, and have concluded, often through a long and searching process, that execution does not honor the memory of their loved ones, or help to heal their own suffering. It is therefore especially painful to them when their anguish is used in the politics of crime control or law enforcement to add emotional weight to support a policy that they so profoundly oppose.[8]

---

[5] JFAA Brief at 1.

[6] *See* Robert P. Mosteller, *Victims' Rights and the Constitution: Moving from Guaranteeing Participatory Rights to Benefiting the Prosecution*, 29 St. Mary's L. J. 1053, 1054 (1998) (describing the shift of the victims' rights movement "from a focus on victims' participation to an effort to advantage the prosecution.")

[7] *See* Andrew J. Karmen, *Who's Against Victims' Rights? The Nature of the Opposition to Pro-Victim Initiatives in Criminal Justice*, 8 St. John's J. Legal Comment 157, 161 (1992) ("What victims define as their own best interests in 'their cases' often diverges from or directly clashes with the goals of the state.").

[8] *See* Lynne Henderson, *Co-Opting Compassion: The Federal Victim's Rights Amendment*, 10 St. Thomas L. Rev. 579, 583 (1998) ("[T]he experiences and voices of many crime victims simply do not fit current ideologies or the politics of crime. Accordingly, many victims are silenced in the name of giving victims a voice."); Susan Bandes, *Victim Standing*, 1999 Utah L. Rev. 331, 333 (1999) (footnotes omitted) ("[T]he sorts of victim initiatives that have been successful have been those, and only those, that advance the prosecution's own agenda, while preserving the prosecutions's complete freedom from third-party interference."). *See also* Lynne Henderson, *The Wrongs of Victim's Rights*, 37 Stan. L. Rev. 937, 1020 (1985) ("The cooptation of victim's concerns by crime control proponents has created a new mythology of victimization that fails to hear those concerns.").

II. FOCUSING ON THE DEATH PENALTY FOR JUVENILES AS A SOURCE OF EMOTIONAL "CLOSURE" DOES NOT SERVE THE NEEDS OF ALL VICTIMS.

JFAA argues that the desires of victims should have constitutional weight in this Court's interpretation of the Eighth Amendment. In rejecting the Court's holding in *Thompson v. Oklahoma* that the execution of offenders who were 15 or younger at the time of the offense violates the Eighth Amendment, JFAA states that "[t]he Court failed to consider society's moral outrage at petitioner's conduct, the atrociousness of the crime, his moral culpability and *the emotions of the victim's family* in its decision."[9] MVFR rejects this attempt to use victims' emotions to argue for the constitutionality of the death penalty for juveniles. This misuse of victims' emotions is particularly dangerous and irresponsible because it does not accurately reflect the views of all victims. The Court cannot contemplate the emotions of victims' families in weighing whether a punishment is cruel and unusual under the Constitution, and if it were to consider emotions of victims, it would be impossible to fairly and evenly weigh the feelings of all victims.

Victims' emotions cannot justify the use of the death penalty because the legal system's purpose is not to heal emotional wounds. Its more practical and focused goals cannot achieve emotional closure for victims and their families.[10] Meaningful support for

---

[9] JFAA Brief at 12 (emphasis added).

[10] Vivian Berger, *Payne and Suffering — A Personal Reflection and a Victim-Centered Critique*, 20 Fla. St. U. L. Rev. 21, 59 (1992) ("The system is not equipped to nurture victims or their representatives.").

victims may come from psychological, religious, or social sources, which can address the individual needs of victims, and without the need to serve a variety of other purposes, such as law enforcement or the protection of defendant rights.

MVFR's opposition to the death penalty, and to the execution of juveniles in particular, is rooted in our members' direct experience of loss and their refusal to respond to that loss with a quest for more killing. Through their own experience, these victims strongly believe that executions are not what will help them heal. MVFR member Robert Hoelscher was seven when his father Ben Hoelscher was murdered in Texas by 17-year-old Gary Sizemore. Robert says, "I would never try to tell another relative of a murder victim to believe something they didn't believe, but for me, healing is not connected to the fate of the perpetrator. Healing is connected to what we build inside of ourselves after the tragedy."

As Vik Kanwar has written, "the requirements of closure and satisfaction are difficult to identify, let alone achieve, through a judicial process competent only to charge, prosecute, and sentence the offender whose crime caused the secondary victim's grief. Courts cannot bring about the ultimate moment of cessation in an infinitely more complicated process of grieving."[11] Sadly, victims who hope that execution will help them heal are often disappointed when the offender's death does not bring the emotional peace or closure that they

[11] Vik Kanwar, *Capital Punishment as "Closure": The Limits of a Victim-Centered Jurisprudence*, 27 N.Y.U. Rev. L. & Soc. Change 215, 241-42 (2001/2002). Lynne Henderson, herself the victim of violent crime, emphasizes the independence of the grieving process from legal developments: "healing takes place whether or not an offender is ever located, much less convicted. Nor does the healing process necessarily end with the successful resolution of a case. Lynne Henderson, *Revisiting Victim's Rights*, 1999 Utah. L. Rev. 383, 418 (1999).

anticipated.[12] Victor Streib has written of his own experience in working with families of murder victims who have been told that the criminal justice system would "fix" their pain:

> I talk with those families years after and I say, "Is it better? This person went to prison or this person was executed. Does this fix it?" No, it is not better. What they wanted was their little girl back. The system could not deliver that. Even worse, it pretended that what they needed was to have us wreak horrible punishments on a few more wretched teenagers, and they would feel better.[13]

JFAA argues that a ruling by this Court permitting the death penalty for juveniles would "respect a person's pride and dignity whose life has been shattered as a result of one's selfish decision to kill."[14] However, for MVFR members, juvenile executions denigrate rather than respect the dignity and individuality of their loved ones. MVFR member Tom Mauser's 15-year-old son Daniel was killed, along with 12 other people, during the shootings at Columbine High School in Littleton, Colorado in 1999. The two students who committed the

[12] Lynne Henderson, *Co-Opting Compassion: The Federal Victim's Rights Amendment*, 10 St. Thomas L. Rev. 579, 595-96 (1998)("Anecdotally, victims who expected the punishment or even execution of the offender would bring them relief, satisfaction, gratification, or an end to the effects of the trauma often find that the effects remain and the 'victory' is a Pyrrhic one."); Lawrence C. Marshall, *The Innocence Revolution and the Death Penalty*, 1 Ohio St. J. Crim. L. 573, 582 (2004) ("There is simply no evidence that executions deliver on their promise of promoting the psychological welfare of murder victims' families.").

[13] Victor Streib, *Juvenile Justice or Injustice? The Debate Over Reform*, 14 St. John's J.L. Comm. 371, 376 (2000).

[14] JFAA Brief at 30.

shootings were 17 and 18, and took their own lives immediately afterward. Tom says, "I have come to learn that, even with the death of my son's killer, even with the pressure of those in society who rush us to 'reach closure,' there is no closure when you lose a child. I believe that a death sentence is merely an attempt to gain revenge, not closure."

Execution of the offender causes some victims to feel implicated in another person's death. Their pain is heightened by the perception that the crime has resulted in yet another loss of life, in which they have played some part. In 1985, MVFR member Patricia Schneider-Zioga's 29-year-old sister Linda Thompson was raped and murdered after being kidnapped from the parking lot of an Oklahoma City shopping mall. The man who murdered her was sentenced to death. Patricia made a statement to the Oklahoma Pardon Board in support of commuting his sentence to life without parole: "I cannot bear that my sister's existence be tied to any more violence. Her murder was in itself extremely violent and it disturbs me deeply that with the prospect of executing her murderer, more violence will be heaped upon already great violence. You must understand that this act cannot bring closure but rather will make my dear sister's death even more painful to me."[15] Many other victims have expressed this sentiment at sentencing and commutation hearings all over the country.

Legal outcomes do not cure the emotional trauma faced by murder victims' families or bring emotional "closure." While we naturally hope to heal these victims' pain, executing juvenile offenders simply cannot serve this purpose.

---

[15] *"This Act Cannot Bring Closure,"* The Voice (Murder Victims' Families for Reconciliation), Spring/Summer 2003, at 9.

III. BECAUSE OF THEIR YOUTH AND UNDER-DEVELOPMENT JUVENILE OFFENDERS HAVE PARTICULAR POTENTIAL TO COME TO UNDERSTAND THE IMPACT OF THEIR CRIME, WHICH CAN PROVIDE SUPPORT TO MANY VICTIMS.

Our juvenile justice system is founded on the principle that youths are capable of change and growth. As this Court has recognized many times, while juveniles over a certain age may be tried in the adult criminal system under certain circumstances, this does not dictate that they should be eligible for all punishments available for adult offenders.[16] This is nowhere more relevant than in the case of the death penalty, which ends any hope for rehabilitation.[17] The possibility of the offender's coming to understand the impact of his or her crime is of critical importance to many family members of murder victims. MVFR member Jennifer Bishop-Jenkins' 23-year-old pregnant sister Nancy, and brother-in-law Richard Langert, were murdered in their Illinois home by a 16-year-old who was convicted and sentenced to life in prison. Jennifer says: "His death would bring me nothing. But his remorse, that might come with

---

[16] *Thompson v. Oklahoma*, 487 U.S. 815, 826 n.24 (1988) (judgment by state that a juvenile is old enough to be tried in criminal court for serious crimes "tells us nothing about the judgment these States have made regarding the appropriate punishment for such youthful offenders"). *See also id.* at 850 (O'Connor, J., concurring in the judgment) ("[t]here are many reasons, having nothing whatsoever to do with capital punishment, that might motivate a legislature to provide as a general matter for some 15-year-olds to be channeled into the adult criminal justice process. . . . Such reasons would suggest nothing about the appropriateness of capital punishment for 15-year-olds.").

[17] *See Woodson v. North Carolina*, 428 U.S. 280, 305 (1976) ("[T]he penalty of death is qualitatively different from a sentence of imprisonment, however long. Death, in its finality, differs more from life imprisonment than a 100-year prison term differs from one of only a year or two.").

time, or even the hope of that possibility, though highly unlikely in our case, would mean a great deal to me. It would mean that he might finally know the full measure of what he took that night. That would be a good thing for me as a victim to know."

Juvenile offenders may offer the most potential for this development as they mature. MVFR member Linda White's daughter Cathy was raped and murdered in Texas by two 15-year-olds. Fifteen years after the murder, after initially supporting the death penalty for juveniles, Linda was able to meet with one of the offenders to confront him with the harm he had done. She says: "It would have been so terrible to execute him. He's had the opportunity to sit there [in prison] and come to grips with what he did, to be remorseful with every bone in his body. I've never seen anybody more remorseful, and he offered us the gift of that."

MVFR member Bill Pelke also experienced the progression of both his own views and the transformation of the juvenile who murdered his family member. In 1986, 16-year-old Paula Cooper became the youngest female on death row in the United States when she was sentenced to death for murdering Bill's 78-year-old grandmother Ruth Pelke in her Indiana home the previous year. Though Bill initially supported the sentence, he felt a powerful change of heart when he came to recognize that his grandmother would have had compassion for Paula and her family. He began to campaign actively to save Paula's life, and in 1989 her sentence was commuted to 60 years in prison, which she is now serving. "Paula is not the same person she was when she committed the crime," Bill says. "After she got off death row, she got her GED and then a college degree, and now she's working for an outside company, from prison, and the money she earns goes into a victims' restitution fund as well as for some prison upkeep. She's now able to give something back. I believe that if they were to execute her now, they

wouldn't be executing the same person who committed that terrible crime."

It is important to many victims to keep that possibility of rehabilitation alive. MVFR member Azim Khamisa's 20-year-old son Tariq was shot and killed in San Diego by 14-year-old Tony Hicks, a teenage gang member. Tony pled guilty to first-degree murder and received a prison sentence of 25 years to life. At his sentencing hearing, Tony made a statement that expressed his regret and shame for his crime. He also wrote a letter to students at his former elementary school, urging them not to do what he did. Azim, who has devoted himself since his son's murder to the prevention of youth violence, says, "Tony's statement, and the letters he writes from prison, have a positive effect on other kids. Think of how many kids he may save. That's going to bring me a lot more healing than if he had gotten the death penalty."

Many family members of victims identify with the family whose child receives a death sentence, adding further reason to oppose the death penalty. Family members, particularly those who have lost a child, often find themselves empathizing with the experience of another grieving family. Regina Hockett's 12-year-old daughter Adriane was murdered in Tennessee by 16- and 17-year-old boys who had gone to school with her own son. Regina says, "I realized they could have been my children. Adriane's father kept saying he wanted the death penalty, and I just looked at him and said, 'That could have been your son.' That's how I'm looking at these boys." Similarly, Bill Pelke, witnessing the anguish of Paula Cooper's grandfather as he watched Paula be sentenced to death, realized his own grandmother — the murder victim — "would not have wanted this grandfather to go through that."

Many victims can be helped to take a step forward in healing if the horror of what was done is acknowledged. Though the state often tells victims that

the death penalty is the ultimate acknow-ledgment of the crime, in fact the death penalty often fails to provide victims with the solace they seek. Instead, victims ask that the state not take away the possibility that the offender himself might acknowledge the devastation he has caused, which can prove to be far more healing for the family.

IV. MEMBERS OF MVFR SUPPORT HUMAN RIGHTS AND OPPOSE THE EXECUTION OF JUVENILES AS A VIOLATION OF INTERNATIONAL HUMAN RIGHTS LAW.

MVFR's human rights mission to abolish the death penalty is based in our core belief that our grief will not be lessened by causing pain to others and that taking a life for a life does not honor a lost loved one. MVFR believes that justice for victims — whose human rights have been so completely violated — does not come from violating the human rights of others.

The world community has spoken loudly and with virtual uniformity in condemning the execution of juveniles as a violation of international human rights law. Victim family members are vocal and active members of this community. MVFR member Milton Jones, whose son Elijah was beaten to death by a 17- and an 18-year-old, states: "It sickens me that my country is willing to violate international human rights standards just so that we can keep sentencing juvenile offenders to death."

It is clear that the United States is not in step with overwhelming international consensus on this human rights issue. If the Court is to consider the needs of victims at all, as the JFAA brief urges, then it must weigh equally the rejection of the juvenile death penalty by many victim family members, which is based in their deeply held beliefs in human rights. An execution of a juvenile carried out in violation of international

standards of human rights does nothing to comfort a grieving family, but only serves to offend their efforts to honor the life of the victim through the highest standards of morality and decency. For the members of MVFR, a death sentence for a juvenile only lowers ourselves as a society to the levels of brutality and violence which brought about our suffering in the first place.

CONCLUSION

Empathy for victims and their families should not be used as a reason to support the executions of those who were 16 and 17 years old at the time of their crime. If this Court is to consider the effect its decision may have on victims' families, it must take into account the diversity of beliefs and needs that exists among those who have suffered the loss of a family member to a juvenile murderer. MVFR members, particularly those whose relatives were murdered by 16- or 17-year-old offenders, do not believe the execution of juveniles will vindicate their rights as victims, help them heal, or honor their loved ones' lives. The death penalty also deprives them of the possibility that these juveniles will come to understand the consequences of their crimes. For MVFR members, who have suffered the devastating effects of murder, these death sentences violate their deeply held beliefs and cause greater pain. Invoking the unbearable sadness of victims to promote the executions of juveniles does not honor their emotions. Rather, it ignores the fact that many victims, while feeling the horror, anger, and sorrow that overwhelm surviving family members after a murder, also hold fervent beliefs in human rights, standards of decency, and an opposition to state killing.

Respectfully submitted,

KATE LOWENSTEIN
Counsel of Record
MURDER VICTIMS' FAMILIES
FOR RECONCILIATION
2161 Massachusetts Avenue
Cambridge, MA 02140
(617) 868-0007

EMILY SACK
Associate Professor of Law
ROGER WILLIAMS UNIVERSITY
SCHOOL OF LAW
10 Metacom Avenue
Bristol, RI 02809

Counsel for Amici Curiae